

**UNOPPOSED JOINT MOTION  
FOR EXTENSION OF TIME  
FOR RESPONSES AND  
REPLIES REGARDING  
PLAINTIFFS' MOTION FOR  
LEAVE TO FILE SECOND  
AMENDED COMPLAINT**

The parties respectfully request an extension for Defendants and Defendant-Intervenors to respond to Plaintiffs' Motion for Leave to File Second Amended Complaint ("Motion to Amend"), Dkt. 148, to January 7, 2022, and for Plaintiffs to reply in support of their Motion to Amend to January 21, 2022, and, in support thereof, state as follows:

1. Plaintiffs filed their Motion to Amend on December 2, 2021.
2. Defendant and Defendant-Intervenors deadline to respond to Plaintiffs' Motion to Amend is currently December 16, 2021.
3. Plaintiffs deadline to reply in support of their Motion to Amend is currently December 30, 2021.
4. In light of the upcoming holidays, and other briefing deadlines in this matter, the parties request additional time to brief the Motion to Amend.

Wherefore, the parties respectfully request an extension to January 7, 2022 for responses to Plaintiffs' Motion to Amend and to January 21, 2022 for Plaintiffs' reply in support of their motion to amend.

Date: December 9, 2021

s/ Paul Carlos Southwick

Paul Carlos Southwick  
(OSB 095141)  
TRIAL ATTORNEY  
Religious Exemption Accountability  
Project  
Paul Southwick Law, LLC  
8532 N. Ivanhoe St. #208,  
Portland, OR 97203  
Email: paul@paulsouthwick.com  
Phone: 503-806-9517

BRIAN M. BOYNTON  
Acting Assistant Attorney General

CARLOTTA P. WELLS  
Assistant Director, Federal Programs  
Branch

/s/ Hilarie E. Snyder

CAROL FEDERIGHI, TX Bar No.  
06872950  
Lead Counsel  
HILARIE E. SNYDER, DC Bar No.  
464837  
United States Department of Justice  
Civil Division, Federal Programs  
Branch  
P.O. Box 883  
Washington, DC 20044  
Phone: (202) 305-0747  
hilarie.e.snyder@usdoj.gov

Attorneys for Defendants

/s/ Gene C. Schaerr

Gene C. Schaerr, DC Bar # 416368\*  
Email: gschaerr@schaerr-jaffe.com  
Nicholas Miller, MI Bar# P70694\*  
Email: nmiller@schaerr-jaffe.com  
Joshua J. Prince, DC Bar # 1685532\*  
Email: jprince@schaerr-jaffe.com  
Schaerr | Jaffe LLP  
1717 K Street NW, Suite 900  
Washington, D.C. 20006  
Telephone: (202) 787-1060

/s/ Herbert G. Grey

Herbert G. Grey, OSB # 810250  
4800 SW Griffith Drive, Suite 320  
Beaverton, Oregon 97005-8716  
Telephone: (503) 641-4908  
Email: herb@greylaw.org  
\* Admitted pro hac vice

Counsel for Defendant-Intervenor  
Council for Christian Colleges &  
Universities

/s/ Mark A. Lippelmann

Kristen K. Waggoner, OSB #  
067077

Lead Counsel

Email: kwaggoner@ADFlegal.org

David A. Cortman, GA Bar #

188810\*

Email: dcortman@ADFlegal.org

Ryan J. Tucker, AZ Bar # 034382\*

Email: rtucker@ADFlegal.org

Mark A. Lippelmann, AZ Bar #

036553\*

Email: mlippelmann@ADFlegal.org

Alliance Defending Freedom

15100 N. 90th Street

Scottsdale, Arizona 85260

Telephone: (480) 444-0020

\* Admitted pro hac vice

Counsel for Defendants-Intervenors  
Western Baptist College d/b/a  
Corban University, William Jessup  
University and Phoenix Seminary